

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS,
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

**REQUEST FOR SPECIAL ACTION
PURSUANT TO LOCAL RULE 5.1(C)**

**DEXIA BANK BELGIUM'S EMERGENCY MOTION FOR A
PROTECTIVE ORDER POSTPONING CERTAIN DEPOSITIONS**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and Local Rule 5.1(c), Defendant Dexia Bank Belgium ("Dexia") respectfully requests that this Court issue a protective order postponing certain depositions of Dexia employees previously scheduled for early March until a mutually-agreeable date in late April or early May. Given that Class Plaintiffs' motion to amend is currently pending before this Court, such a brief postponement is warranted while the Court determines which claims are at issue in this litigation, and which claims are not. In further support of this motion, Dexia relies on the accompanying Memorandum of Law, and the Declaration of Jeff E. Butler.

CERTIFICATION

The undersigned counsel for Defendant Dexia Bank Belgium in the above-captioned actions hereby certifies that Dexia Bank Belgium has complied with the requirements of Federal Rule of Civil Procedure 26(c), and Local Rules 7.1(A)(2) and 37.1(B), by conferring with counsel for Plaintiffs in an attempt to resolve or narrow the issues raised in this motion, and that the parties were unable to resolve or narrow such issues.

REQUEST FOR ORAL ARGUMENT

Dexia Bank Belgium respectfully requests to be heard at oral argument on this motion.

Respectfully submitted,

MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO

By: /s/ Breton Leone-Quick
Peter M. Saparoff (BBO#441740)
Breton Leone-Quick (BBO#655571)

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Counsel for Dexia Bank Belgium

February 24, 2006

Certificate of Service

I, Breton Leone-Quick, hereby certify that this document, and the accompanying Declaration of Jeff E. Butler, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 24, 2006.

/s/ Breton Leone-Quick

Dated: February 24, 2006